

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

The government has begun to provide discovery in this case. However, it is unknown whether additional evidence remains to be disclosed. Accordingly, Amanda Letourneau, by and through her undersigned attorney, respectfully moves the Court to Order the government to disclose the following information:

A. Requested and Required Discovery

1. Any and all written, recorded, or oral statements made by Ms. Letourneau or copies thereof within the possession, custody or control of the government, the existence of which is known, or by the exercise of due diligence may become known to the attorney for the government;
2. The substance of any oral statement made by Ms. Letourneau, or the co-defendant, whether before or after arrest, which the government intends to offer in evidence at the trial;
3. A copy of the prior criminal record of Ms. Letourneau and her co-defendant which is known, or by the exercise of due diligence may become known to the attorney for the government including arrests that did not lead to convictions; convictions for any level

of offense including petty offenses, traffic offenses, misdemeanors and felonies; and materials related to probation violations for any convictions.

4. Permission for Ms. Letourneau to inspect and/or copy books, papers, documents, photographs, tangible objects which are within the possession, custody or control of the government, including photographs used by case agents in their investigations to identify Ms. Letourneau. This request includes all items which are material to the preparation of the defense or are intended for use by the government as evidence in chief at the trial, or which were obtained from or belonged to Ms. Letourneau.

5. Permission of Ms. Letourneau to inspect and copy the results of any physical or mental examinations or scientific tests or experiments, including but not limited to fingerprint, blood, tissue, fluid or chemical analyses.

6. A written summary of all testimony the government intends to introduce under Rules 702, 703 or 705 of the Federal Rules of Evidence during its case in chief at trial; a description of the witness' opinions, including the bases and reasons therefore; and a description of the witness' qualifications.

If prior to trial, the government discovers additional evidence or material previously requested or ordered which is subject to discovery or inspection hereinbefore requested, the government is requested to notify attorney for the defendant the existence of the additional material. Fed. R. Cr. P. 16(c).

B. Legal Authority

This motion, filed pursuant to Fed. R. Cr. P. 12(b)(3), is based on Fed. R. Cr. P. 16, which mandates timely disclosure of the requested materials. Pursuant to those rules, Ms. Letourneau has a right to the requested disclosures forthwith.

Dated: November 12, 2019

Respectfully submitted,

s/Shannon Elkins

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